

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of)	
themselves and all others similarly situated,)	Case No. 5:21-cv-00097-SLP
)	
Plaintiffs,)	
)	
v.)	
)	
TOWN OF VALLEY BROOK, et al.,)	
)	
Defendants.)	
)	
)	

**JOINT STATUS REPORT REGARDING
DISCOVERY DEPOSITIONS**

By and through their attorneys, Plaintiffs Kimiesha Hill, Jason Garnett, and Kiara McCorkle (“Plaintiffs”) and Defendants Town of Valley Brook, Lewis Nieman, Stephen Haynes, and Michael Stamp (“Defendants”) submit the following Joint Status Report Regarding Discovery Depositions pursuant to the Court’s instructions at the June 9, 2023 hearing.

On May 19, 2023, Plaintiffs filed a Motion to Compel Defendants to Answer Interrogatories and for Sanctions and, on May 22, 2023, a Motion for Sanctions Against Defendant Judge Stephen Haynes (together, the “Motions”). ECF Nos. 88, 90. On June 5, 2023, Defendants filed responses to the Motion to Compel and the Motion for Sanctions, ECF Nos. 94, 95, and Defendant Stephen Haynes filed a separate response to the Motion for Sanctions on June 6, 2023. ECF No. 96. On June 9, 2023, the parties participated in a

meet and confer and, immediately following, the Court heard argument related to both Motions. In accordance with the Court's June 9, 2023 hearing minutes, ECF No. 100, the parties respectfully submit this Joint Status Report informing the Court that they have reached the following agreements regarding additional procedures related to discovery depositions:

1. **Additional Depositions on Discovery.** Plaintiffs shall be allowed to depose each Defendant, including a 30(b)(6) representative for Defendant Town of Valley Brook, on any issues related to discovery in this action (the "Discovery Depositions"). The Discovery Depositions will not count toward the discovery limits set forth in Rules 30 and 31 of the Federal Civil Rules of Civil Procedure. *See also* LCvR30.1. Each Discovery Deposition will take place at a mutually agreed time and place by the parties to be scheduled no later than June 30, 2023.
2. **Reasonable Fees and Costs.** Defendants agree to pay a set amount, to be agreed upon by the parties, for reasonable fees and costs incurred by Plaintiffs related to the Discovery Depositions, including but not limited to attorneys' fees, travel costs, and court reporter and transcription costs.

<p>June 16, 2023</p> <p><u>/s/ Courtney D. Powell</u> Courtney D. Powell 9400 N. Broadway Extension, Suite 600 Oklahoma City, Oklahoma 73114-7423 Telephone: (405) 844-9900 Facsimile: (405) 844-9958 cpowell@spencerfane.com</p> <p><i>Attorney for Defendants</i></p>	<p>Respectfully submitted,</p> <p><u>/s/ Jason A. Leckerman</u> Jason A. Leckerman Lisa Swaminathan Izabella Babchinetskaya Ballard Spahr LLP 1735 Market St. 51st Floor, Philadelphia, PA 19103 215.864.8266 DIRECT LeckermanJ@ballardspahr.com SwaminathanL@ballardspahr.com BabchinetskayaI@ballardspahr.com <i>Admitted pro hac vice</i></p> <p>Woodrow K. Glass (OBA #15690) Jonathan M. Irwin (OBA #32636) Ward & Glass 1601 36th Ave NW Norman, OK 73072 405.253.4031 DIRECT woody@wardglasslaw.com jonathan@wardglasslaw.com</p> <p>Arthur Ago Tianna Mays Lawyers' Committee for Civil Rights Under Law 1500 K Street NW, Suite 900 Washington, DC 20005 202-662-8600 DIRECT aago@lawyerscommittee.org tmays@lawyerscommittee.org <i>Admitted pro hac vice</i></p>
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